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PATRICK W. BEGOS
1055 Washington Boulevard
Stamford, CT 06901-2249
Main (203) 462-7500
Fax (203) 462-7599
pbegos@rc.com
Direct (203) 462-7550

Also admitted in Massachusetts
and New York

May 13, 2025

VIA ECF

Hon. Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

Re: ***Martin Erdei v. Unum Group and Unum Life Insurance Company of America,***
Case No. 1:25-cv-01716-MKV

Dear Judge Vyskocil:

This firm represents Defendants, Unum Group and Unum Life Insurance Company of America (“Defendants”) in this action. With the consent of Plaintiff’s attorneys, Defendants respectfully submit this request for an extension of time to meet and confer to discuss the possibility of settlement and file a Joint Letter and Proposed Case Management Plan, in accordance with the Scheduling Order issued by Your Honor on May 1, 2025 (Dkt. 14).

Pursuant to Rule 2(G) of Your Honor’s Individual Practices, Defendants state the following in support of their request:

1. The Parties’ current deadline to meet and confer to discuss the possibility of settlement is May 15, 2025 and the deadline to file a Joint Letter and Proposed Case Management Plan is May 19, 2025. Defendants request an extension of both deadlines for fourteen (14) days, to May 29, 2025 and June 2, 2025, respectively.
2. This is Defendants’ first request for an extension of the deadlines to meet and confer to discuss the possibility of settlement and file a Joint Letter and Proposed Case Management Plan;
3. Defendants submit this request for an extension of time to allow time to schedule a productive settlement discussion with Plaintiff and properly investigate Plaintiff’s claims;
4. Plaintiff has consented to Defendants’ request for an extension;
5. The parties are not currently scheduled to appear before the Court; and
6. The requested adjournment will not affect any other deadlines or scheduled dates.

For the foregoing reasons, Defendants respectfully requests the Court extend the parties’ deadlines to meet and confer to discuss the possibility of settlement to May 29, 2025 and the deadline to file a Joint Letter and Proposed Case Management Plan to June 2, 2025.

Robinson+Cole

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We thank Your Honor for your consideration of this request. If Your Honor has any questions or concerns, please do not hesitate to contact my office.

Respectfully,

/s/ Patrick W. Begos
Patrick W. Begos

cc: All Counsel of Record (via ECF)

Granted. SO ORDERED.

Date: May 14, 2025
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge